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Attorneys for Plaintiff CHANEL, INC.

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

RS

CHANEL, INC.,

Plaintiff,

v.

THE PARTNERSHIPS OR
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A" and
DOES 1-100,

Defendants.

Case No.

CV 13 2645

**PLAINTIFF'S EX PARTE APPLICATION
FOR ENTRY OF TEMPORARY
RESTRAINING ORDER, PRELIMINARY
INJUNCTION, AND ORDER
RESTRAINING TRANSFER OF ASSETS
TIED TO THE COUNTERFEITING
OPERATION**

Plaintiff, Chanel, Inc. ("Plaintiff" or "Chanel"), hereby does apply, on an *ex parte* basis, for entry of a temporary restraining order and, upon expiration of the temporary restraining order, a preliminary injunction against Defendants, the Partnerships or Unincorporated Associations identified on Schedule "A" hereto and Does 1-100 (collectively "Defendants"), pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65.

Good cause exists for the foregoing orders. As set forth in the accompanying Memorandum of Points and Authorities, the Defendants and various unknown associates are promoting, selling, offering for sale and distributing counterfeit and infringing Chanel branded products within this

1 Judicial District through the commercial e-stores identified on Schedule "A" hereto (collectively, the
 2 "Subject E-Store Names")¹ and the websites operating under the domain names identified on
 3 Schedule "B" hereto (collectively, the "Subject Domain Names"). The activities of the Defendants
 4 constitute unfair competition and willful and intentional infringement and counterfeiting of Chanel's
 5 trademarks in total disregard of Chanel's rights and have taken place in spite of the Defendants'
 6 knowledge that their use of Chanel's trademarks was and is in direct contravention of Chanel's
 7 rights. The Defendants' unlawful activities have caused and will continue to cause irreparable injury
 8 to Chanel.

9 This Application is based upon the accompanying Memorandum of Points and Authorities
 10 and the Declarations of Stephen M. Gaffigan, Adrienne Hahn Sisbarro, Malerie Maggio, and Eric
 11 Rosaler and exhibits thereto, filed concurrently herewith, and the complete files and records of this
 12 action, and such other matters as Chanel may call to the Court's attention at or before the time of
 13 hearing.

14 Upon entry of a temporary restraining order, the Application, supporting papers, Order,
 15 Complaint and all other pleadings and documents on file in this action will be served on each
 16 Defendant via the corresponding e-mail addresses provided by Defendants (i) as part of the domain
 17 registration data for each of their respective domain names, or (ii) on their Internet websites, and the
 18 customer service e-mail addresses used to communicate with Plaintiff's investigators, or (iii) on each
 19 Defendant via the online submission forms provided on the Internet websites and e-stores operating
 20 under their respective Subject E-Store Names, and provide a copy of the Temporary Restraining
 21 Order by e-mail to the registrar of record for each of their respective domain names, or by other
 22 means reasonably calculated to give notice which is permitted by the Court.

23 WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests this Court grant
 24 its *ex parte* application and enter a temporary restraining order as to Defendants in the form
 25 submitted herewith and schedule a hearing on Chanel's Motion for Preliminary Injunction before the
 26

27 ¹ The Defendants in this matter operate exclusively from storenvy.com subdomains excepting
 28 Defendants 3 and 5 which also operate glambing.us and theprettylittlegeek.com, respectively.

1 expiration of the temporary restraining order.

2
3 Dated: June 10, 2013

KELLER, SLOAN, ROMAN & HOLLAND LLP

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5 By: 

ANNE E. KEARNS

6 Attorneys for Plaintiff, Chanel, Inc.

SCHEDULE "A"
DEFENDANTS BY NUMBER AND SUBJECT E-STORE NAMES

Defendant Number	Defendant/Subject E-Store Name
1	helloglitz.storenvy.com
2	phonecandys.storenvy.com
3	storenvy.com/stores/27815-glam-bling
4	glamorme.storenvy.com
5	storenvy.com/stores/46854-the-pretty-little-geek
6	lccboutique.storenvy.com
7	rainbowsmile.storenvy.com

SCHEDULE "B"
SUBJECT DOMAIN NAMES

Defendant Number	Defendant/Subject Domain Name
3	glambling.us
5	theprettylittlegeek.com